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January 13, 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Written *ex parte* presentation in IB Docket No. 12-340; IB Docket No. 11-109;
IBFS File Nos. SAT-MOD-20120928-00160; SAT-MOD-20120928-00161;
SES-MOD-20121001-00872**

Dear Ms. Dortch:

On January 11, 2016, Reed Hundt, a board member of New LightSquared LLC (“New LightSquared”) and co-counsel with the undersigned, and Geoff Stearn with New LightSquared, met with Julius Knapp, Ronald Repasi, Charles Mathias, Jennifer Tatel, Robert Nelson, Michael Ha, Brian Ryan, Paul Murray, Steve Jones, Bruce Romano, and Matthew Pearl of the Commission; Kristin Amerling, Karen Van Dyke, Mark Dowd, and Christopher Perry of the Department of Transportation (“DOT”); Paige Atkins, Peter Tenhula, Derek Khoplin and Edward Drocella of NTIA; and John Hickey, Steven Malina, and Bruce Decleene of the Federal Aviation Administration (“FAA”). Messrs. Jones, Hickey, Malina, and Decleene participated by telephone.

The purpose of the meeting was to explain the license modification applications New LightSquared filed on December 31, 2015 (the “License Modification Applications”) and to discuss related issues. The parties used the graphic in Attachment A to illustrate the limitations on New LightSquared’s network deployment incorporated in the settlement agreements reached with Garmin and Deere (the “Coexistence Agreements”). The parties explained that these firms constitute essential members of the GPS Innovation Alliance, and that the Coexistence Agreements require as a condition subsequent that LightSquared make a filing at the Commission to obtain the Commission’s approval of the limitations. By seeking the license modifications, the parties also intend to provide the protections and predictability of the power limits to all other firms involved in designing or selling GPS devices and services, as well as to all consumers of such goods and services. To underscore this point, the parties discussed the industry data contained in Attachment B, which shows that Deere and Garmin devices populate nearly all of the different categories of GPS devices except smartphones and certified aviation. No one suggests that smartphones raise any interference issues. Aviation, the parties explained

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as set forth below, will be addressed by LightSquared's suggestion that the Commission embed in the license for 1526-1536 MHz the condition that the licensee operate in deference to FAA standards. Therefore, the parties stated that the Commission should find it significant that Deere and Garmin have concluded that they have no objection to New LightSquared's terrestrial deployment subject to these license modifications. The parties added that a public notice on the Coexistence Agreements and the License Modification Applications would solicit comment on whether other design and manufacturing firms agree with that conclusion and thus would welcome the license modifications.

The parties emphasized that in light of the Coexistence Agreements described above and the License Modification Applications submitted to the Commission—and the notice-and-comment process on those filings that will be triggered by a public notice on these submissions—the goals of DOT's Adjacent Band Compatibility Study ("ABC Study") have been met. Indeed, as the parties explained, one of the reasons the company initiated and successfully completed the Coexistence Agreements was that it learned in detail in the DOT's series of ABC Study Workshops what issues are important to both the DOT and the GPS companies. In short, the Workshops shaped and defined the Coexistence Agreements.

The parties stressed that New LightSquared has worked vigorously and continues to do so to reach an understanding regarding its network deployment with all stakeholders in the aviation industry and the FAA, the GPS industry and the DOT, the National Oceanic and Atmospheric Association ("NOAA") and the private parties interested in NOAA's use of the 1675-1680 MHz band, and with its regulator, the FCC. The parties also expressed their willingness to provide further details to the relevant government agencies about New LightSquared's deployment plans.

With respect to aviation, the parties explained New LightSquared's proposal in its License Modification Applications would require the company to determine, after consultation with FAA, the proper power levels such that the licensee would guarantee that its operations would comply with the FAA's Minimum Operational Performance Standards ("MOPS") as embodied in Technical Standard Orders ("TSOs"). The parties used Attachment C to illustrate the process and the result. The parties explained that this proposal was intended to address the very important issue of safety surrounding certified aviation devices (or non-consumer GPS devices). The parties also discussed opportunities to discuss the workings of this deferential regulatory proposal with the FAA and to obtain FAA's guidance on this method going forward.

Finally, the parties repeated their request that the Commission issue a public notice related to the issues raised in the License Modification Applications so that all interested parties may have the opportunity to comment on the new power limits the License Modification Applications set forth and New LightSquared's plans for terrestrial deployment and how these limitations will benefit all consumer GPS devices. The parties explained the timing benefits related to completing the comment cycle related to such a public notice by late spring of 2016.

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Please direct any questions to the undersigned.

Sincerely,

/s/ Gerard J. Waldron

Gerard J. Waldron

Ani Gevorkian

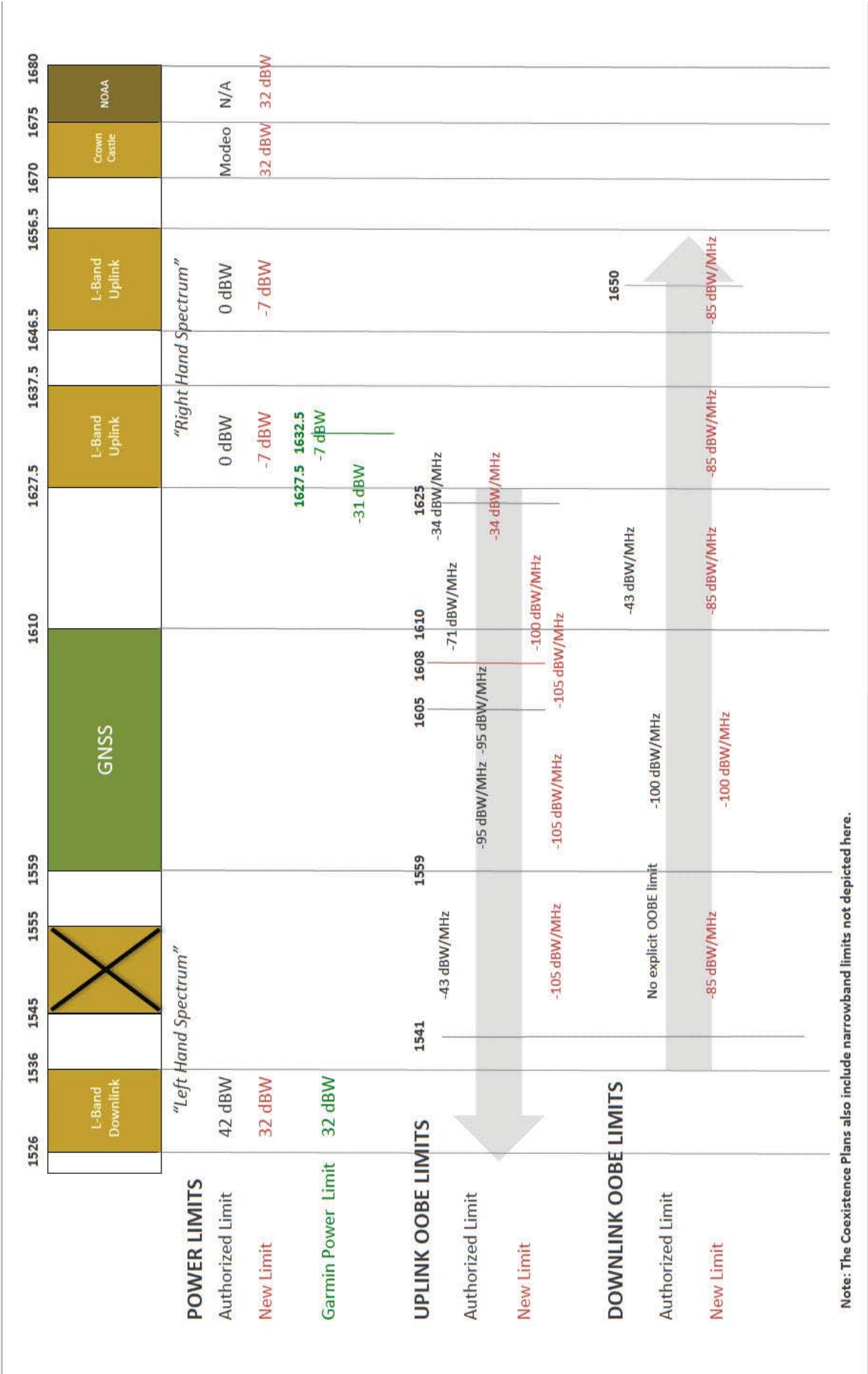
Counsel to New LightSquared LLC

Attachments

cc: Julius Knapp
Ron Repasi
Robert Nelson
Michael Ha
Brian Ryan
Paul Murray
Steve Jones
Bruce Romano
Matthew Pearl
Steve Jones
Charles Mathias
Jennifer Tatel
Kristin Amerling
Karen Van Dyke
Mark Dowd
Christopher Perry
Paige Atkins
Peter Tenhula
Derek Khoplin
Edward Drocella
John Hickey
Steven Malina
Bruce Decleene

ATTACHMENT A

Technical Operating Parameters Specified in Coexistence Plans



ATTACHMENT B

VALUE CHAIN

Design, and subsequently performance, is controlled by suppliers for GLN and by device OEMs for cellular, aviation & high precision [To be updated]

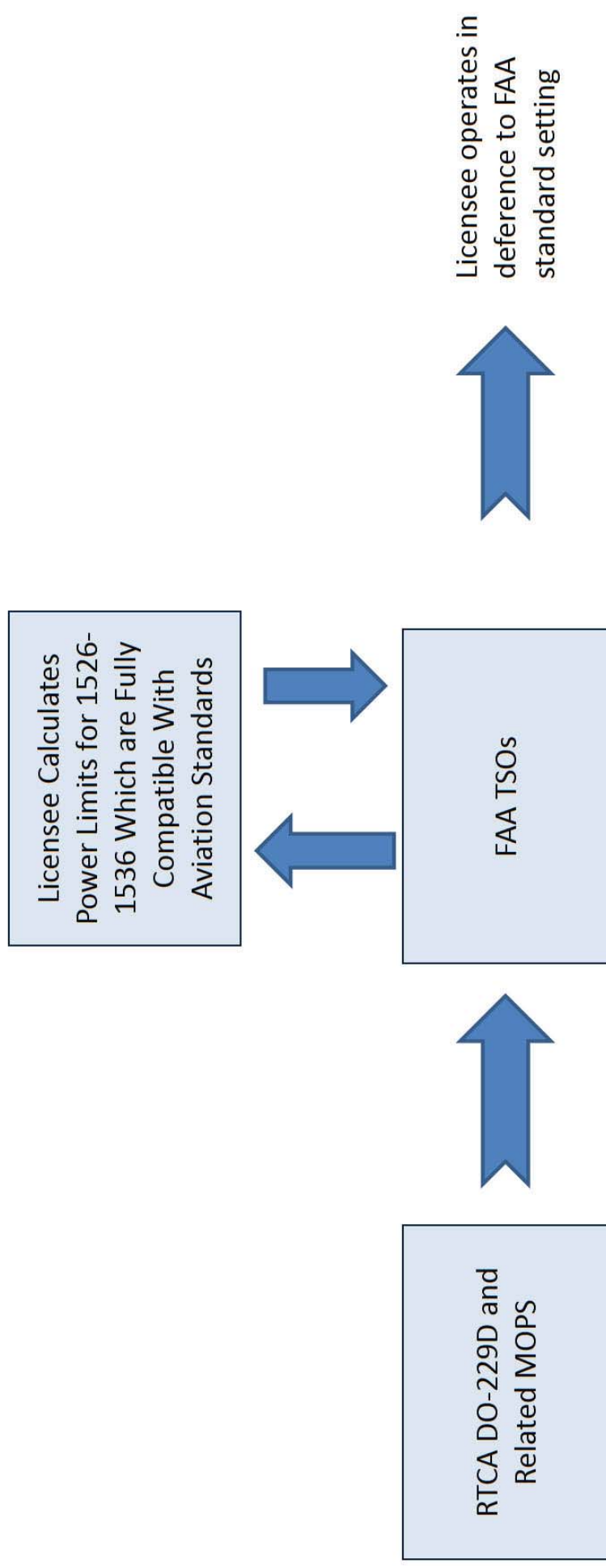
Supplier controls design ■ OEM defines spec, supplier designs ■ Device OEM controls design

Category / Application	Require-ment	Antenna Subsystem		Receiver Subsystem	
		Antenna	RF front-end (LNA, filter)	GPS Chipset / RF IC	Control point (early hypothesis)
General Location/Navigation	1 In-car Navigation	<ul style="list-style-type: none"> Accuracy Denso Harman Delphi 			Module and chip manufacturers Ex: U-blox, Furuno, Qualcomm, Broadcom
	2 PND	<ul style="list-style-type: none"> Accuracy Space 	<ul style="list-style-type: none"> Garmin TomTom 		Module and chip manufacturers Ex: STMicro, Mediatek
	3 Wearables/Outdoors	<ul style="list-style-type: none"> Accuracy Space 	<ul style="list-style-type: none"> Garmin Fitbit 		Module and chip manufacturers Ex: Mediatek
	4 Others (Marine, asset tracking)	<ul style="list-style-type: none"> Accuracy 	<ul style="list-style-type: none"> Garmin Trimble 		Module and chip manufacturers Ex: Furuno
Cellular	5 Smartphones	<ul style="list-style-type: none"> Power consumption Space 	<ul style="list-style-type: none"> Apple Samsung 		Module and chip manufacturers Ex: Texas instruments,
	6 FAA certified aviation	<ul style="list-style-type: none"> Accuracy Reliability 	<ul style="list-style-type: none"> Rockwell Honeywell 		Device OEM Ex: Apple, Samsung
High Precision	7 Agriculture	<ul style="list-style-type: none"> Accuracy 	<ul style="list-style-type: none"> Trimble Topcon Leica Deere 		Device OEM Ex: Rockwell, Honeywell
	8 Surveying				Device OEM Ex: Trimble, Deere, Topcon, Leica
	9 Construction				Device OEM Ex: Trimble, Deere, Javad, Novatel
Timing	10 Mapping				
	11 Time keeping devices	<ul style="list-style-type: none"> Accuracy 	<ul style="list-style-type: none"> Trimble Topcon, Leica, Novatel, Javad 		Device OEM Ex: Trimble, Deere, Javad, Novatel

Control point

ATTACHMENT C

Determine Power Level Consistent with MOPS and TSOs



Standoff Distances, Exclusion Areas and Compliance Monitoring

